

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

(continued)

My Pillow, Inc.; Michael J. Lindell; Mike
Lindell Products LLC; Lindell Media LLC;
Lindell Technologies, LLC; Lindell
Properties, LLC; Lindell Publishing, LLC;
Lindell Services, LLC; Lindell Management,
LLC; Prior Lake 40 Acres, LLC; and
Lindell-TV LLC,

Civ No.: 0:24-cv-04535-JMB-TNL

Plaintiffs,

v.

Lifetime Funding, LLC; FunderZgroup,
LLC; Michael Kandkhorov; Michael Kand;
Abe Kand; Tiffany Johnson; Sam
Hernandez; Alan Hernandez; CapShot
Financial; and John and Jane Does,

Defendants.

DECLARATION OF MICHAEL KANDHOROV

1. I am over twenty-one years of age, competent to testify in a legal proceeding, and give this Declaration of my own personal knowledge.
2. I am the managing partner of Defendant Lifetime Funding, LLC ("Lifetime").
3. I have reviewed Lifetime's books and records as they pertain to this file and am fully familiar with those books and records. I have personal knowledge that the records attached to this Declaration were made in the regular course of Lifetime's business pursuant to Lifetime's regular business practices and procedures. The records are maintained under my supervision and control. The records were made at or around the time of the transactions reflected therein (or within a reasonable time thereafter). I have personal knowledge that, as part of Lifetime's regular

business practices and procedures, Lifetime relies on the attached business records to document and verify the transactions reflected therein.

4. A true and correct copy of the September 19, 2024, Future Receivables Sale and Purchase Agreement (the “Agreement”) between Lifetime and Plaintiffs is attached hereto as **Exhibit A**.

5. A true and correct copy of Lifetime’s remittance history for the Agreement is attached hereto as **Exhibit B**.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this the 23rd day of January, 2025.



Michael Kandhorov